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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT COURT FOR THE DISTRICT OF NEVADA (LAS VEGAS)**

12 DANIEL ANDREWS,

13 Plaintiff,

14 vs.

15 HENDERSON POLICE
16 DEPARTMENT; JOSEPH EBERT; R.
17 ADAMS; K. LAPEER; K. LIPPISCH
18 and DOES 1 to 10, inclusive,

19 Defendants.

Case No. 2:18-cv-01625-RFB-PAL

**STIPULATION AND ORDER TO
EXTEND EXPERT DISCLOSURE
DEADLINES**

(FIRST REQUEST)

20 Pursuant to LR 1A 6-1 and LR 26-4, the parties, by and through their respective counsel of
21 record, hereby stipulate and request that this Court extend the interim status report, initial expert
22 disclosure, and rebuttal expert disclosure deadlines in the above-captioned case. In support of this
23 Stipulation and Request, the parties state as follows:

24 Plaintiff DANIEL ANDREWS, by and through its attorneys of record, the law firm of Peter
25 Goldstein Law Corporation, and Defendants, CITY OF HENDERSON, INCORRECTLY
26 DESIGNATED AS HENDERSON POLICE DEPARTMENT; JOSEPH EBERT; R. ADAMS; K.
27 LAPEER, AND K. LIPPISCH (collectively "Defendants"), by and through their attorneys of record,
28 City of Henderson's City Attorney's Office, hereby stipulate and agree to as follows:

1 1. The Discovery Cut-Off date is currently April 24, 2019. The parties have agreed to
2 extend the Discovery Cut-Off date to **June 21, 2019;**

3 2. The interim status report deadline is currently February 21, 2019. The parties agree that
4 the deadline for Defendants to disclose their initial expert is hereby extended until **April 22, 2019;**

5 3. The initial expert disclosure deadline is currently February 21, 2019. The parties agree that
6 the deadline for Defendants to disclose their initial expert is hereby extended until **April 22, 2019;**

7 4. The rebuttal expert disclosure deadline is currently March 25, 2019, however based
8 upon the parties' agreement to extend the initial expert disclosure for the deadline to disclose rebuttal
9 experts is hereby extended until **May 22, 2019.**

11 5. The Parties have exchanged initial disclosures and in order to conduct meaningful
12 fact discovery for experts, they will need an additional thirty-two days to exchange expert
13 disclosures.

14 5. The following is a list of the current discovery deadlines and the parties' proposed
15 extended deadlines.

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-Off	April 24, 2019	June 21, 2019
Interim Status Report	February 21, 2019	April 22, 2019
Initial Expert Disclosure	February 21, 2019	April 22, 2019
Rebuttal Expert Disclosure	March 25, 2019	May 22, 2019

23 7. This Request for an extension of time is not sought for any improper purpose or other
24 purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient
25 time to complete necessary discovery prior to expert disclosures in this case and adequately prepare
26 their respective cases for trial. Plaintiff has noticed five (5) depositions, and has submitted
27 interrogatories and requests for production to the City of Henderson, Interrogatories to Defendant

1 Ebert, and Requests for Admission to Defendant Adams. Defendants are in the process of moving
2 the court to allow the deposition of Plaintiff, who is incarcerated in the State of Nevada. Defendants
3 also expect to propound initial written discovery by February 14, 2019. Because of the discovery
4 that will be required before expert disclosures, and because the parties are actively engaging in
5 discovery, good cause exists for the requested extensions.

6 8. This is the first request for an extension, and applies only to the necessary dates
7 related to expert disclosures and the Discovery Cut-Off Date to allow the parties to fully complete
8 discovery. The parties are only extending the discovery cut off deadline and interim status report
9 deadline in order to accommodate the extended expert deadlines. No other dates are being extended.
10 The parties respectfully submit that the reasons set forth above constitute compelling reasons and
11 good cause for the short extension.

12 13 Dated: February 12, 2019 14 LAW OFFICES OF PETER GOLDSTEIN 15 By: <u>/s/ Peter Goldstein, Esq.</u> 16 Peter Goldstein Esq. 17 Bar No. 6992 18 10785 West Twain Ave., Ste. 230 19 Las Vegas, NV 89135 20 Attorney for Plaintiff DANIEL ANDREWS	12 13 Dated: February 12, 2019 14 CITY OF HENDERSON 15 By: <u>/s/ Michael J. Oh, Esq.</u> 16 Michael J. Oh, Esq. 17 Nevada Bar No. 7470 18 Wade B. Gochnour, Esq. 19 Nevada Bar No. 6314 20 240 Water Street, MSC 144 Henderson, NV 89015 Attorneys for Defendants HENDERSON POLICE DEPARTMENT, JOSEPH EBERT, R. ADAMS, K. LAPEER, K. LIPPISCH
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21
22 **ORDER**

23 IT IS SO ORDERED.

24 Dated this 13 day of February, 2019.

25 
26 U.S. DISTRICT COURT JUDGE
27 U.S. MAGISTRATE JUDGE
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